

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

*In re*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**APPLICATION OF ERIN E. DEXTER  
FOR ADMISSION *PRO HAC VICE***

**TO THE HONORABLE COURT:**

COMES NOW Erin E. Dexter, Esq. (the “Applicant”) and respectfully requests *pro hac vice* admission to this Court, by stating as follows:

1. Applicant is an attorney with the law firm Milbank, Tweed, Hadley & McCloy LLP with offices at:

<b>Address</b>	:	1850 K St NW, Suite 1100 Washington, DC 20006
<b>E-Mail</b>	:	EDexter@milbank.com
<b>Telephone</b>	:	(202) 835-7547
<b>Fax</b>	:	(202) 263-7547

2. Applicant will sign all pleadings with the name Erin E. Dexter.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

3. Applicant does not reside in the Commonwealth of Puerto Rico.

4. Applicant has been retained as counsel by plaintiff Ambac Assurance Corporation (“Ambac”), to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.

5. Since 2014, Applicant has been and presently is a member in good standing of the bar of the highest court of the State of Maryland. The State of Maryland does not assign bar license numbers. Since 2016, the Applicant has been and presently is a member in good standing of the bar of the highest court of the District of Columbia. Applicant’s District of Columbia bar license number is 1027839.

6. Applicant has not applied to practice and has not been admitted to practice in any additional courts.

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. During the past three years, Applicant has not filed for *pro hac vice* admission in the United States District Court for the District of Puerto Rico.

10. Local counsel of record associated with Applicant in this matter is:

<b>Name</b>	:	Roberto A. Cámara-Fuertes
<b>USDC-PR Bar No.</b>	:	219002
<b>Email</b>	:	rcamara@ferriaioli.com
<b>Address</b>	:	P.O. Box 195168 San Juan, PR 00919-5168
<b>Telephone No.</b>	:	(787) 776-7000 x 366
<b>Fax No.</b>	:	(787) 776-7001

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11. Applicant has been furnished a copy of, and has read, the Local Rules of the United States District Court for the District of Puerto Rico<sup>2</sup> and agrees to comply with them in their entirety.

12. Applicant is further aware that such rules provide in part that attorneys appearing *pro hac vice* must pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee shall be completed either through the CM/ECF payment module (using the pay.gov portal) or by attaching a check or money order payable to "Clerk, U.S. District Court."

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled cases only.

In Washington, DC, this 23rd day of August, 2017.

  
Erin E. Dexter

I HEREBY CERTIFY that I consent to the designation of local counsel of record for all purposes pursuant to Local Rule 83.1(f).

In San Juan, Puerto Rico, this 23rd day of August, 2017.

s/ Roberto A. Camara-Fuertes  
Roberto A. Camara-Fuertes  
USDC-PR No. 219002

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<sup>2</sup> Latest version (with amendments through September 2, 2010) available at [http://www.prd.uscourts.gov/sites/default/files/documents/94/Local\\_Rules\\_amended\\_as\\_of\\_Sept\\_2\\_2010\\_with\\_TOC.pdf](http://www.prd.uscourts.gov/sites/default/files/documents/94/Local_Rules_amended_as_of_Sept_2_2010_with_TOC.pdf).

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notification of such filing to all CM/ECF Participants.

In San Juan, Puerto Rico, this 23rd day of August, 2017.

**Ferraiuoli** LL(

PO Box 195168

San Juan, PR 00919-5168

Phone: 787.766.7000

Fax: 787.766.7001

**s/ Roberto A. Cámara Fuertes**

Roberto A. Cámara Fuertes

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